

2013 JUN -4 17:11:46  
OFFICE OF THE CLERK  
U.S. DEPARTMENT OF JUSTICE

FEDERAL ELECTION COMMISSION  
UNDER OF THE FEDERAL ELECTION COMMITTEE ACT

REVOLVIS CONSULTING, INC.;

Complainant,

Vs.

PAIGE V. KREEGEL;  
KREEGEL FOR CONGRESS; and  
VICKIE POTTS;

MUR # 6712

Respondents.

COMPLAINT

Complainant, REVOLVIS CONSULTING, INC. (the "Complainant"), swears to and files this complaint pursuant to 11 C.F.R. § 111.4 against the respondents, PAIGE V. KREEGEL, KREEGEL FOR CONGRESS, and VICKIE POTTS (collectively, the "Respondents"); and states the following in support thereof:

Parties

1. The Complainant is a California corporation with its principal place of business located at 1029 K street, Suite 44, Sacramento, CA 95814.
2. PAIGE V. KREEGEL is a Florida resident.
3. KREEGEL FOR CONGRESS (FEC ID C00492488) was and is the principal campaign committee for PAIGE V. KREEGEL as a candidate for the United State Congress; a true and correct copy of the Statement of Organization is attached hereto as Exhibit "A" and incorporated herein by reference.
4. VICKIE POTTS is a Florida resident and the treasurer for KREEGEL FOR CONGRESS; see the Statement of Organization attached hereto as Exhibit "A."

**Factual Allegations**

5. The Complainant and PAIGE V. KREEGEL d/b/a. KREEGEL FOR CONGRESS ("Kreegel") entered into an oral agreement (the "Agreement") wherein the Complainant would provide campaign consulting services (the "Services") to Kreegel in exchange for the Kreegel's payment for the Services; a true and correct copy of the unexecuted contract is attached hereto as **Exhibit "B"** and incorporated herein by reference.

6. The Complainant fully performed its obligations under the Agreement and subsequently billed Kreegel for the Services.

7. Kreegel failed to pay in full for the Services performed by the Complainant.

8. The Complainant provided written notice to Kreegel of the unpaid balance in the total amount of \$49,762.63 (the "Debt"); true and correct copies of the written notices are attached hereto as **Exhibit "C"** and incorporated herein by reference.

9. As of the date of the complaint, the above-stated balance remains unpaid.

**Administrative Regulations/Statutes**

10. According to 11 C.F.R. §104.11(a), the following is required:

*"Debts and obligations owed by or to a political committee which remain outstanding shall be continuously reported until extinguished. See 11 CFR 104.3(d). These debts and obligations shall be reported on separate schedules together with a statement explaining the circumstances and conditions under which each debt and obligation was incurred or extinguished..."*

11. Additionally, 11 C.F.R. 104.3(d) provides the following:

*"Reporting debts and obligations. Each report filed under 11 CFR 104.1 shall, on Schedule C or D, as appropriate, disclose the amount and nature of outstanding debts and obligations owed by or to the reporting committee..."*

12. Under 11 C.F.R. 104.14(d), the "treasurer of a political committee, and any other person required to file any report or statement under these regulations and under the Act, shall be

personally responsible for the timely and complete filing of the report or statement and for the accuracy of any information or statement contained in it."

**Violation of Regulations/Statutes**

13. On October 13, 2012, VICKIE POTTS, as treasurer for KREEGEL FOR CONGRESS, filed the October Quarterly Report covering the months of July 2012 through October 2012 with the Federal Election Commission.

14. The Debt was incurred and remained outstanding during the time period covered by the October Quarterly Report.

15. VICKIE POTTS and PAIGE V. KREEGEL, on behalf of KREEGEL FOR CONGRESS, failed to report the Debt in the October Quarterly Report as required by the above-referenced Administrative Regulations/Statutes.

FURTHER COMPLAINANT SAYETH NOT.

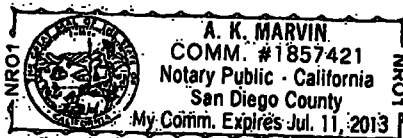
Revolvis Consulting, Inc.

By: [Signature]  
Jason Cabel Roe

Title: PRESIDENT

Date: 12/21/12

SWORN TO AND SUBSCRIBED before me this 21<sup>st</sup> day of Dec, 2012  
by JASON CABEL ROE, as the President of Revolvis Consulting, Inc., who is  
personally known to me or provided driver license as identification.



[Signature]  
Signature of Notary Public,  
State of CALIFORNIA

My Commission Expires: Jul 11, 2013

45121353

Image# 12970792170

PAGE 1 / 4

**FEC  
FORM 1****STATEMENT OF  
ORGANIZATION**

Office Use Only

1. NAME OF  
COMMITTEE (in full)(Check if name  
is changed)Example: If typing, type  
over the lines.

12FE4M5

**KREEGEL FOR CONGRESS**

ADDRESS (number and street)

3821 B TAMiami TRAIL #321

(Check if address  
is changed)

PORT CHARLOTTE

FL

33952

CITY

STATE

ZIP CODE

COMMITTEE'S E-MAIL ADDRESS (Please provide only one e-mail address)

limerick18317@embargo.com

(Check if address  
is changed)

COMMITTEE'S WEB PAGE ADDRESS (URL)

(Check if address  
is changed)

2. DATE

02 03 2012

3. FEC IDENTIFICATION NUMBER

C00492488

4. IS THIS STATEMENT

NEW (N)

OR

☒

AMENDED (A)

*I certify that I have examined this Statement and to the best of my knowledge and belief it is true, correct and complete.*Type or Print Name of Treasurer **VICKIE POTTS**

Signature of Treasurer

**VICKIE POTTS**

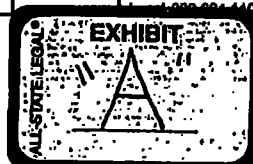
[Electronically Filed]

Date

03 26 2012

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. §437g.

ANY CHANGE IN INFORMATION SHOULD BE REPORTED WITHIN 10 DAYS.

Office  
Use  
OnlyFor further information contact:  
Federal Election Commission  
Toll Free 800-424-9530  
1-800-694-1100**FEC FORM 1**  
(Revised 02/2009)

## 5. TYPE OF COMMITTEE

**Candidate Committee:**

- (a) ☒ This committee is a principal campaign committee. (Complete the candidate information below.)
- (b) ☐ This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)

Name of Candidate

PAIGE VANIER KREEGEL

Candidate  
Party Affiliation

REP

Office  
Sought:☒ House☐ Senate☐ President

State

FL

District

19

- (c) ☐ This committee supports/opposes only one candidate, and is NOT an authorized committee.

Name of  
Candidate**Party Committee:**

- (d) ☐ This committee is a ☐ (National, State or subordinate) committee of the ☐ (Democratic, Republican, etc.) Party.

**Political Action Committee (PAC):**

- (e) ☐ This committee is a separate segregated fund. (Identify connected organization on line 6.) Its connected organization is a:

☐ Corporation☐ Corporation w/o Capital Stock☐ Labor Organization☐ Membership Organization☐ Trade Association☐ Cooperative☐ In addition, this committee is a Lobbyist/Registrant PAC.

- (f) ☐ This committee supports/opposes more than one Federal candidate, and is NOT a separate segregated fund or party committee. (i.e., nonconnected committee)

☐ In addition, this committee is a Lobbyist/Registrant PAC.☐ In addition, this committee is a Leadership PAC. (Identify sponsor on line 6.)**Joint Fundraising Representative:**

- (g) ☐ This committee collects contributions, pays fundraising expenses and disburses net proceeds for two or more political committees/organizations, at least one of which is an authorized committee of a federal candidate.
- (h) ☐ This committee collects contributions, pays fundraising expenses and disburses net proceeds for two or more political committees/organizations, none of which is an authorized committee of a federal candidate.

**Committees Participating in Joint Fundraiser**

1.

FEC ID number

C

2.

FEC ID number

C

3.

FEC ID number

C

4.

FEC ID number

C

Write or Type Committee Name

KREEGEL FOR CONGRESS

## 6. Name of Any Connected Organization, Affiliated Committee, Joint Fundraising Representative, or Leadership PAC Sponsor

KREEGEL FOR CONGRESS

Mailing Address

10010 DORICRILL

PORTLAND

FL

33100

CITY

STATE

ZIP CODE

Relationship: ☒ Connected Organization ☐ Affiliated Committee ☐ Joint Fundraising Representative ☐ Leadership PAC Sponsor

## 7. Custodian of Records: Identify by name, address (phone number -- optional) and position of the person in possession of committee books and records.

Full Name

VICKIE P

Mailing Address

10010 DORICRILL AV

PORTLAND

FL

33100

Title or Position

CITY

STATE

ZIP CODE

Telephone number

Telephone number

901

331

33100

## 8. Treasurer: List the name and address (phone number -- optional) of the treasurer of the committee; and the name and address of any designated agent (e.g., assistant treasurer).

Full Name  
of Treasurer

VICKIE P

Mailing Address

10010 DORICRILL AV

PORTLAND

FL

33100

CITY

STATE

ZIP CODE

Title or Position

Telephone number

Telephone number

901

331

33100

15044371327

Full Name of  
Designated  
Agent

Mailing Address

CITY

STATE

ZIP CODE

Title or Position

Telephone number

9. Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc.

PALM BEACH NATIONAL BANK

Mailing Address

1000 OCEAN DRIVE

POMONA GORDA

FL

33060

CITY

STATE

ZIP CODE

Name of Bank, Depository, etc.

Mailing Address

CITY

STATE

ZIP CODE

15044371228